



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

July 3, 2012

LISA LISKER, TREASURER
SENATE CONSERVATIVES FUND
228 S. WASHINGTON STREET, SUITE 115
ALEXANDRIA, VA 22314

Response Due Date

08/07/2012

IDENTIFICATION NUMBER: C00448696

REFERENCE: FEBRUARY MONTHLY REPORT (01/01/2012 - 01/31/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 item(s):

1. Schedule A of your report discloses earmarked contributions totaling \$67,282.44, with no corresponding entries on Schedule B. Pursuant to 11 CFR §110.6(c)(1)(v), all earmarked contributions that have passed through a conduit's account must be itemized on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of amount. All earmarked contributions that have been forwarded in the form of the contributor's check or written instrument must be itemized as memo entries on the receipt (Schedule A) and disbursement (Schedule B) schedules, regardless of the amount. Please amend your report to clarify these discrepancies.

2. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour report(s) for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The report must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action

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concerning this matter, your prompt response will be taken into consideration.
(11 CFR §104.3(b))

3. Your committee has filed a 48 hour report for an independent expenditure supporting Raphael Edward Ted Cruz and Don Stenberg (see attached) which has not been itemized on Schedule E supporting Line 24 of the Detailed Summary Page. Please be advised that independent expenditures disclosed on 48 hour reports must also be itemized on a corresponding Schedule E or MEMO Schedule E and Schedule D (if applicable), in the appropriate reporting period. Further, if the actual payment(s) for the independent expenditure(s) occurs after the date of dissemination, the appropriate report(s) should continue to show payment on Schedule E and Schedule D, until the debt is fully extinguished. Please amend your report and any subsequent reports that may be affected by this correction. (11 CFR §104.4)

4. Schedule B discloses expenditure(s) for "Direct Mail Postage," "Direct Mail Production," "Media Production," "Online Ads," and "Printing." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1159.

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Sincerely,



Allen Norfleet
Senior Campaign Finance Analyst
Reports Analysis Division

Late 48 Hour Report (Schedule E)
Senate Conservatives Fund (C00448696)

Name of Payee	Date	Amount	Purpose	Candidate	Report Received
Senate Conservatives Fund	1/7/12	\$25.75	IE-Cruz-Online Processing	Rafael Edward Cruz	4/2/12
Senate Conservatives Fund	1/14/12	\$98.75	IE-Cruz-Online Processing	Rafael Edward Cruz	4/2/12
Red Sea LLC	1/17/12	\$500,000.00	IE-Cruz-Media Buy	Rafael Edward Cruz	4/2/12
Red Sea LLC	1/17/12	\$7,365.00	IE-Cruz-Media Production	Rafael Edward Cruz	4/2/12

**48 Hour Report Filed For Independent Expenditures Not Disclosed On Schedule E
Senate Conservatives Fund (C00448696)**

Name of Payee	Date	Amount	Purpose	Candidate
Red Sea LLC	1/3/2012	\$8,665.00	IE-Stenberg-Media Production	DON STENBERG
Red Sea LLC	1/17/2012	\$7,365.00	IE-Cruz-Media Production	RAFAEL EDWARD TED CRUZ